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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICKEY A. BECHTEL,

Plaintiff,

v.

DANIEL A. VIRTUE, Business Agent of the
International Brotherhood of Teamsters;
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS; ABF FREIGHT SYSTEM,
INCORPORATED,

Defendants.

: NO. 01-CV-789
: Judge Sylvia H. Rambo

FILED
HARRISBURG, PA
MAY 09 2002

MARY E. D'ANDREA, CLERK
Per _____ Deputy Clerk

PLAINTIFF'S REQUEST FOR EXTENSION OF TIME
TO FILE PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT

AND NOW comes Plaintiff, Rickey Bechtel, by and through counsel, Robert S. Mirin, Esquire of Ahmad & Mirin, and respectfully moves this Court to extend the time required to file Plaintiff's Response to Defendants' Motion for Summary Judgment to May 24, 2002 and represents:

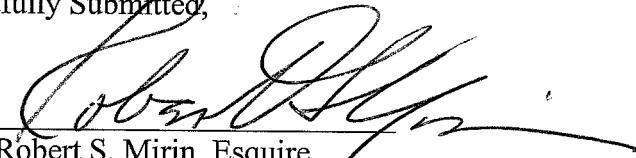
1. This is Plaintiff's first request to extend a deadline in this case.
2. Plaintiff's counsel is presently under attachment to multiple Commonwealth criminal matters in Adams and York County.
3. Plaintiff is unable to obtain necessary affidavits from Plaintiff's witnesses due to their limited availability. These witnesses work as over the road driver's with schedules which frequently keep them out of town and with extremely limited availability. The Court's decision denying consolidation of this matter with Albright et. al. vs. Daniel Virtue et. al. was denied on May 6, 2002 and received on May 7, 2002.

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4. Counsel for Defendant ABF concurs with this request. Counsel for other Defendants' have been contacted but due to their unavailability concurrence was unable to be obtained.

WHEREFORE, it is respectfully requested that this Court grant Plaintiff's an extension of time to file Plaintiff's Response to Defendants' Motion for Summary Judgment in this matter.

Respectfully Submitted,



Robert S. Mirin, Esquire
Supreme Court No.: 25305
AHMAD & MIRIN
8150 Derry Street, Suite A
Harrisburg, PA 17111
Phone: (717) 909-4343
Fax: (717) 561-1616

Date: May 9, 2002

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

RICKEY A. BECHTEL,

Plaintiff,

: NO. 3:01-CV-789

: Judge Sylvia H. Rambo

v.

**DANIEL A. VIRTUE, Business Agent of the
International Brotherhood of Teamsters;
INTERNATIONAL BROTHERHOOD OF
TEAMSTERS; ABF FREIGHT SYSTEM,
INCORPORATED,**

Defendants.

CERTIFICATE OF CONCURRENCE

Pursuant to the Rules of the United States District Court for the Middle District, Rule 7.1, undersigned counsel has sought the concurrence of Joseph E. Santucci, Jr, Esquire, attorney for the Defendant ABF, in Plaintiff's request for an extension of time to file Plaintiff's Response to Defendants' Motion for Summary Judgment to May 24, 2002. Joseph E. Santucci, Jr., Esquire does concur with the motion. Counsel for other Defendants' have been contacted but due to their unavailability concurrence was unable to be obtained.



Robert S. Mirin, Esquire

Dated: May 9, 2002

CERTIFICATE OF SERVICE

I, Beth Thompson, hereby certify that I am this day serving a copy of the foregoing document upon the person(s) and in the manner indicated below, which service satisfies the requirements of the Pennsylvania Rules of Civil and Appellate Procedure, by facsimile and depositing a copy of same in the United States Mail, at Harrisburg, Pennsylvania, with first class postage prepaid, addressed as follows:

For Defendant ABF:

Joseph E. Santucci, Jr., Esquire
Mary D. Walsh, Esquire
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
(202) 739-3001

Vincent Candiello, Esquire
MORGAN, LEWIS & BOCKIUS LLP
417 Walnut Street
Harrisburg, PA 17101
(717) 237-4004

For Defendants Virtue and Local 776:

Ira Weinstock, Esquire
Ira H. Weinstock, P.C.
800 North Second Street
Harrisburg, PA 17101-1904

For Defendant IBT

James A. McCall, Esquire
International Brotherhood of Teamsters
25 Louisiana Avenue, N.W.
Washington, DC 20001

AHMAD & MIRIN


Beth Thompson

Beth Thompson, Paralegal
8150 Derry Street, Suite A
Harrisburg, PA 17111
(717) 909-4343

DATED: 5/9/02